

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

JUN 18 2024

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA

DOCKET NO. 3:24-cr-133-MOC

v.

BILL OF INDICTMENT

JADARIUS CONNELL POTTS

Violations:

a/k/a "BAM"

18 U.S.C. §922(a)(1)(A)

18 U.S.C. §922(g)

THE GRAND JURY CHARGES:

COUNT ONE

(Dealing Firearms Without a License)

Beginning on or about August 23, 2023, and continuing until no later than September 25, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

JADARIUS CONNELL POTTS a/k/a "BAM"

not being a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), 923(a), and 924(a)(1)(D).

COUNT TWO

(Possession of a Firearm by a Felon)

On or about August 23, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

JADARIUS CONNELL POTTS a/k/a "BAM"

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms, to wit: an Omni Tactical .223 pistol, in and affecting commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE

(Possession of a Firearm by a Felon)

On or about September 7, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

JADARIUS CONNELL POTTS a/k/a “BAM”

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms, to wit: an Anderson Manufacturing AM-15 rifle, in and affecting commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT FOUR

(Possession of a Firearm by a Felon)

On or about September 25, 2023, in Mecklenburg County, within the Western District of North Carolina, the defendant,

JADARIUS CONNELL POTTS a/k/a “BAM”

knowing that he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess one or more firearms, to wit: a Springfield Armory, Hellcat, 9mm pistol, in and affecting commerce, in violation of Title 18, United States Code, Section 922(g)(1).

(Remainder of page left intentionally blank)

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Pursuant to Federal Rule of Criminal Procedure 32.2, notice is hereby given of 18 U.S.C. § 924 and 28 U.S.C. § 2461(c). The following property is subject to forfeiture in accordance with Section 924 and/or Section 2461(c): all firearms and ammunition involved or used in the violations set forth in this bill of indictment.

The Grand Jury finds probable cause to believe that the following property subject to forfeiture on the grounds stated above:

- (a) Omni Tactical .223 pistol and all associated magazines and ammunition seized on or about August 23, 2023.
- (b) Anderson Manufacturing AM-15 with an obliterated serial number and all associated silencers, magazines and ammunition seized on or about September 7, 2023.

A TRUE BILL

FOREPERSON

DENA J. KING
UNITED STATES ATTORNEY



BRANDON L. BOYKIN
ASSISTANT UNITED STATES ATTORNEY